

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

IN RE: VALSARTAN, LOSARTAN, AND
IRBESARTAN PRODUCTS LIABILITY
LITIGATION

Hon. Robert. B. Kugler

This Document Relates To:

Civ. No. 19-2875 (RBK/JS)

All Actions

**PLAINTIFFS' AMENDED NOTICE OF VIDEOTAPED
DEPOSITION TO BERNADETTE ATTINGER**

TO: **Alexis Brancato, Esq.**
Brittney Nagle, Esq.
Kirkland & Ellis, LLP
601 Lexington Avenue,
New York, NY 10022

Counsel for Defendants Torrent Pharmaceuticals LTD and Torrent Pharma Inc.

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, Plaintiffs will take the videotaped deposition of Bernadette Attinger, former Senior Director of Regulatory Affairs of Torrent Pharma Inc. The deposition will commence on **Thursday May 20, 2021, at 9:00 a.m. Eastern Standard Time**, and continue until completion, at 214 Route 152, Perkasio, Pennsylvania 18944, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632).

The witness shall produce the documents requested at Exhibit A, attached hereto, at least 5 days in advance of the deposition.

The deposition will be taken upon oral examination before an officer authorized to administer oaths. A translator will not be provided. Testimony given during the deposition will be recorded by sound video recording and stenographic means.

TAKING ATTORNEYS FOR PLAINTIFFS:

John Joseph Cronan, III
Preti Flaherty Beliveau & Pachios LLP
One City Center
P.O. Box 9546
Portland, ME 04101
(207) 791-3000
jcronan@preti.com

Jeff Gibson
Wagner Reese, LLP
201 N. Illinois St.
16th Floor – South Tower
Indianapolis, IN 46204
(866) 389-1352

DATED this 1st day of April, 2021.

BARTON AND BURROWS, LLC

By: /s/ Stacy A. Burrows
Stacy A. Burrows
5201 Johnson Drive, Suite 110
Mission, KS 66205
Phone (913) 563-6253

Attorneys for Plaintiffs

EXHIBIT A

DOCUMENT REQUESTS

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Bernadette Attinger.
2. All documents in Bernadette Attinger's possession pertaining to Torrent Pharmaceuticals Limited and Torrent Pharma Inc.'s production, sale, and recall of valsartan, losartan, and irbesartan products and any communications in her possession regarding the same.

CERTIFICATE OF SERVICE

I, Stacy Burrows, hereby certify that on April 1st, 2021, I caused true and correct copies of the foregoing to be transmitted via ECF to all counsel having registered an appearance on ECF, with courtesy copies served on counsel for Torrent Pharmaceuticals Limited and Torrent Pharma Inc., and Defendants' liaison counsel, via email.

DATED this 1st day of April, 2021.

BARTON AND BURROWS, LLC

By: /s/ Stacy A. Burrows
Stacy A. Burrows
5201 Johnson Drive, Suite 110
Mission, KS 66205
Phone (913) 563-6253

Attorneys for Plaintiffs